Allowable Costs, WUFAR, and WISEgrants

How WISEgrants uses WUFAR to assist subrecipients in meeting Allowable Cost Requirements

Federal Funding Conference
March 2020



Uniform Grant Guidance

Subpart E – Cost Principles

Addresses 55 "items of cost" that receive clarification regarding allowability, in general, for using federal funds.

Is not an exhaustive or minutely detailed list, so...Provides guidance on "Basic Considerations" to apply to all costs, listed or not listed.

Factors affecting allowability of costs

- ❖ Is the cost <u>allowed</u> under the specific federal grant program? §200.403 (b)
- ❖ Is the cost necessary to meet the program objectives? §200.403 (a)
- ❖ Is the amount of the cost reasonable? §200.404
 - Did the subrecipient follow sound business practices?
 - Would the cost be considered a fair market price?
- ❖ Would the same cost be funded with local dollars? §200.403 (c)
 - Did the LEA consider its responsibilities to the LEA, its students, the public, and government?
- Is there supporting documentation for charges to the grant? §200.403 (g)

Allocable to the Federal Award

A cost is allocable to a particular Federal award if the goods/services involved are assignable to that Federal award in accordance with relative benefits received. (2 CFR §200.405(a))

To what extent are the expenditures charged to a particular grant program benefiting the program?

Allocable to the Federal Award

When a subrecipient charges 100 percent of an expenditure to a federal program, the LEA must ensure that the program is receiving the entire benefit of these costs.

Example:

100 supplemental reading program site licenses are purchased with IDEA flow-through funds.

The LEA uses 75 site licenses for special education and 25 site licenses for "any student who needs it." This is <u>not</u> allocable. The cost of 25 site licenses would be considered an unallowed cost.

A teacher spends 25% of her time working on the federal program objectives, therefore 25% of the teacher's salary is charged to the federal award.

Grant funded staff use the Internet, so the LEA charges 3% of its network costs to the federal award.

Allocable with supporting Time and Effort documentation

Not Allocable – not based on actual usage or cost

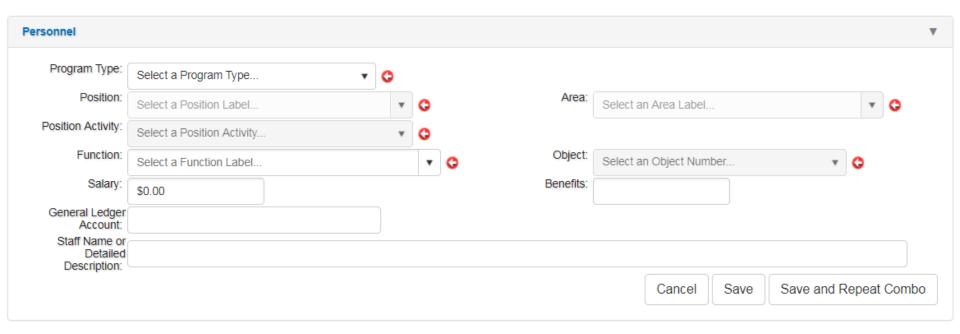
Allowable Costs Drive Choices

The budget drop-down choices available within WISEgrants are driven by allowed costs under each program.

If you can't find the budget combination you are looking for:

- Use the Search by Budget Combination panel on the budget screen
- Check DPI website for for technical assistance on allowable costs (such as the IDEA Allowables document)
- Contact the DPI consultant assigned to your agency to follow-up on an allowable costs.

Budget entry:



Each selection prefills the next drop-down choice

Search for Budget Combinations:

Search for Budget Combinations

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Instructions:

- Type a term into the search bar below.
- 2. The search tool will display a list of all WUFAR combinations containing the specified term(s).
- 3. Select the desired WUFAR combination from the list.
- 4. If the WUFAR combination you are looking for is not listed, try using a different search term. (The search tool will not search by Program Type).

	Therapy	× •			
4	Program Type	Purchase Item	Purchase Item Detail	Function	Object
	Public School	Non-Capital Equipment	Non-Capital Equipment	218100 - Occupational Therapy	440 - Non-(
	Public School	Supplies	General Supplies	218100 - Occupational Therapy	411 - Gene
	Public School	Supplies	Testing Supplies	218100 - Occupational Therapy	490 - Other
	Public School	Supplies	Testing Supplies	218100 - Occupational Therapy	481 - Techr
	Public School	Non-Capital Equipment	Non-Capital Equipment	218100 - Occupational Therapy	482 - Techr
	Public School	Software	Computer Software	218100 - Occupational Therapy	483 - Softw
	Public School	Non-Capital Equipment	Non-Capital Equipment	218200 - Physical Therapy	440 - Non-(
	Public School	Supplies	General Supplies	218200 - Physical Therapy	411 - Gene

Search by keyword (or number) - Selecting item populates budget entry fields

Act Carl D.

Act

Perkins

Carl Perkins CTE

(Formula Version) CTE

Perkins

CTE

200

132000

Business Education

53

Teacher

0250

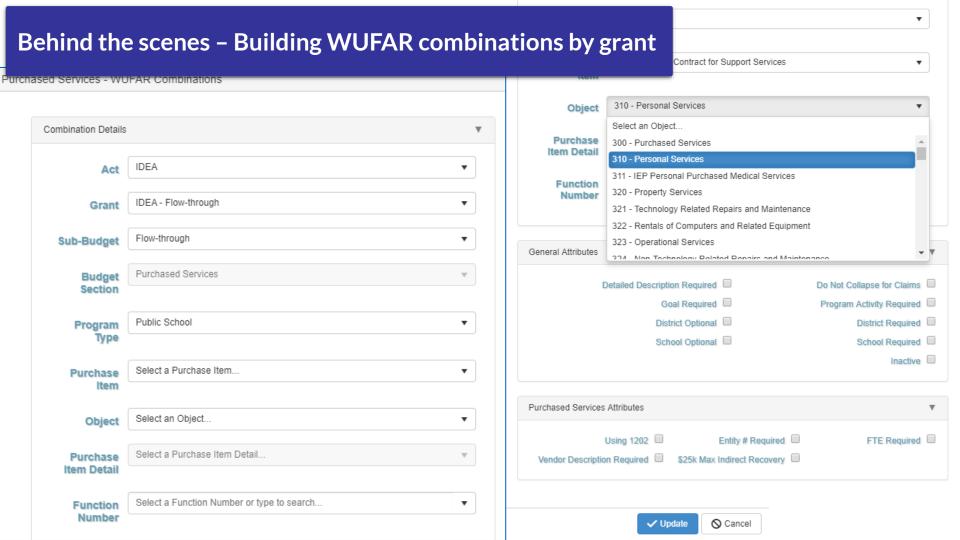
Business Education

Bel	Behind the scenes – Building WUFAR combinations by grant											
	Personnel - WUFAR Combinations											
Sections												
Copy WU	FAR Combinations											
	Filter List: Clear Filter											
Drag a col	umn header and dro	p it here to gr	oup by that colum	nn								
Act :	Grant :	Sub- Budget	Program : Type	Object : Number	Function : Number	Function Label	Position : Number	Position Label	Area : Number	Area Label	Position : Activity	
Carl D. Perkins Act	Carl Perkins CTE (Formula Version)	Perkins CTE	СТЕ	200	130000	Vocational Curriculum	43	Short Term Substitute Teacher	0000	No Description Beyond Position	Standard (Default)	
Carl D. Perkins Act	Carl Perkins CTE (Formula Version)	Perkins CTE	CTE	200	130000	Vocational Curriculum	97	Program Aide	0907	Teacher's Aide	CTE Classroom Support	
Carl D. Perkins Act	Carl Perkins CTE (Formula Version)	Perkins CTE	CTE	200	131000	Agriculture Education	53	Teacher	0200	Agriculture	Standard (Default)	
Carl D. Perkins	Carl Perkins CTE (Formula Version)	Perkins CTE	CTE	200	132000	Business Education	53	Teacher	0281	Business and Office - Vocational	Standard (Default)	

1

Standard

(Default)



Program Types in WISEgrants

Some federal program have requirements in which subrecipients must spend grant funds on certain prescribed activities.

These categories of cost are often represented in WISEgrants by Program Types. Program Types will be the first selection required when budgeting.

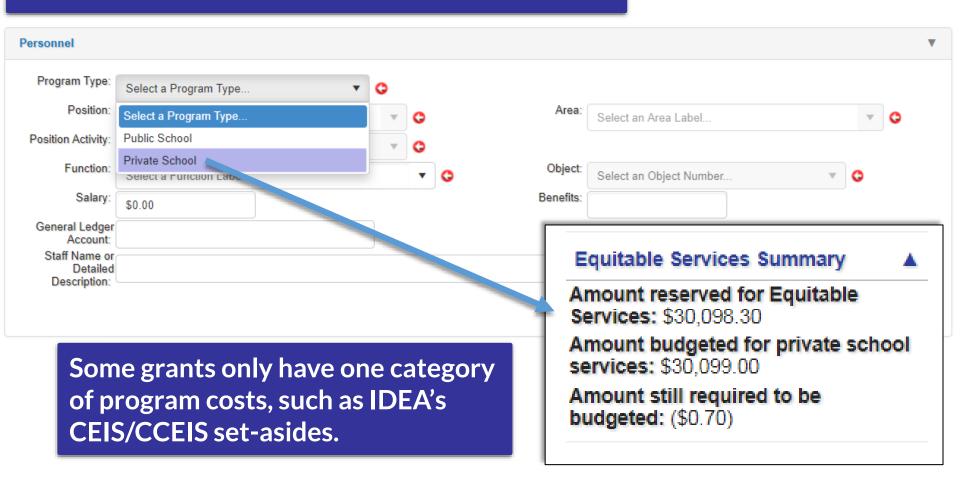
For example:

- Flow-through / Preschool: Public School/Private School
- Title I-A: Administration, Schoolwide, Homeless
- Title II-A: Professional Development, Title II-A Implementation

WISEgrants Terminology - Program Type

Drives WUFAR... What It Is **WISEgrants Program Type** Classification None **Private School Administration Public School** Safe and Healthy **Professional Schoolwide Schools Development**

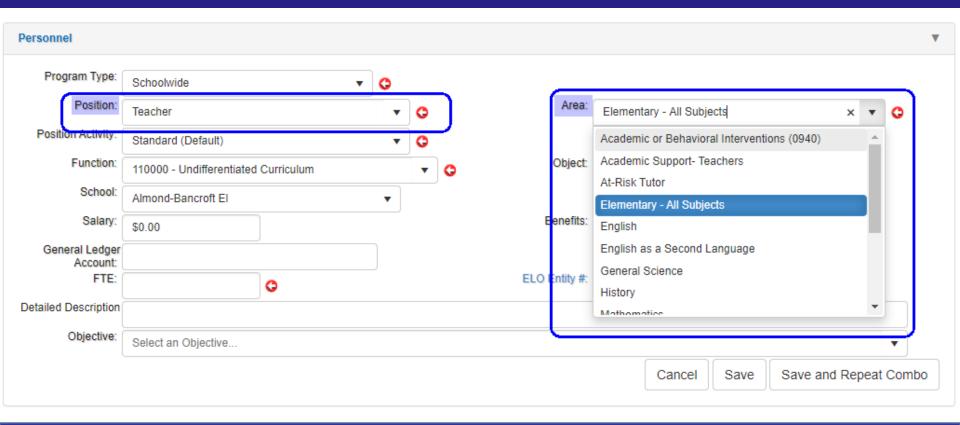
Program Type tracks categories of program costs



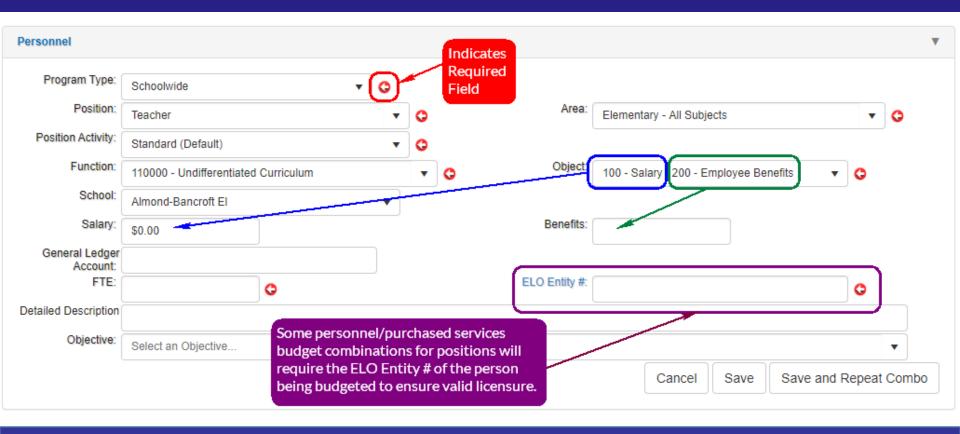
Personnel Section

- 1. Each personnel budget item requires a "Position" and "Area"
 - Matches the position and area available in WISEstaff.
 - License validation is built into WISEgrants for certain positions.
- 2. Each personnel budget item requires a "Position Activity"
 - "Standard (Default)" indicates the position's activities are synonymous with the Position/Area
- If a license number or name is required, only one individual's salary and benefits should be included in the budget entry.

Personnel Section



Personnel Section



Time & Effort Documentation

§200.430 (i)
Standards for
Documentation of
Personnel
Expenses

Time & Effort documentation is STILL required.

Charges to federal awards must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal control which provides <u>reasonable</u> assurance that the charges are accurate, allowable, and properly allocated.
- Be incorporated into the official records of the subrecipient.



Personnel Issues with Budgets

Timeline – Subrecipient enters a budget at the beginning of the fiscal year (or before) and may include staff that end up not being there once the school year starts.

- Make sure payroll and grant budgets are in alignment.
- Budge revisions can be made at any time throughout the year.

Single Audit & State Findings

Single audit findings for time & effort reporting have resulted in DPI discovering that staff charged to the subrecipient's grant were not actually on an approved budget.

This has also been uncovered when reviewing the auditor's special education categorical aid "no-valid license" reports.

"Staff" Position

If the position normally requires a license but the software allows a subrecipient to roll-up several salaries into one line, the individuals funded by the grant must still hold appropriate DPI licenses.

- Substitute teachers
- Substitute special education aides
- Salary and benefits of staff for activities outside of contracted time (curriculum development, family engagement events, attending professional development)
- Stipends or teacher salary differentials

"Staff" Position

Position

Area

Position Activity

Staff

No Description Beyond Position

Staff Roll-Up

Credit Reimbursement

IEP Activities

Other Improvement of Instruction

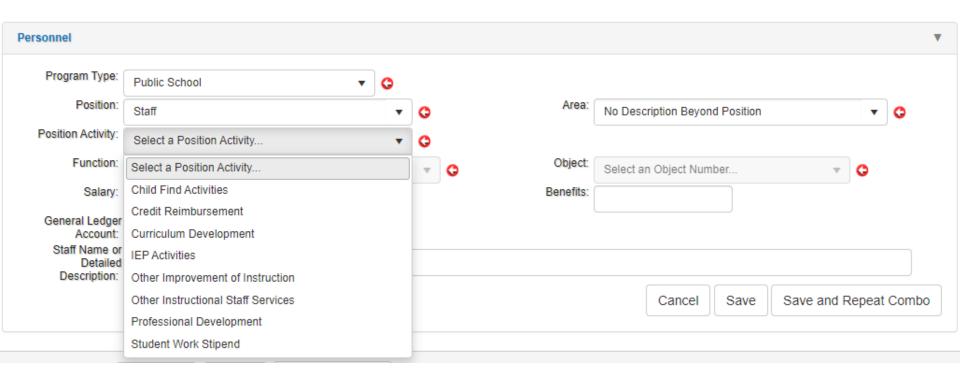
Other Instructional Staff Services

Extended
Contract-Family
Engagement

Student Work
Stipends

Transition Services

"Staff" Position



WISEgrants Terminology - Purchase Item

WISEgrants

What It Is

Drives WUFAR...

Purchase Item

Broad Category of Cost

Object

Employee Travel

Communications

Property Services

Supplies

Contract with Vendor

Pupil Transportation

Equipment

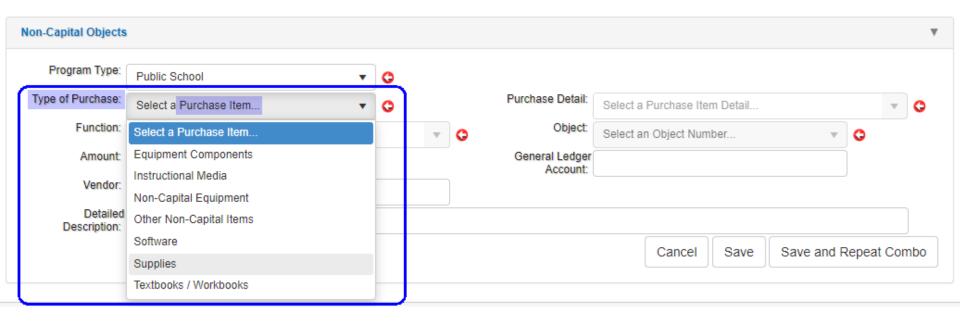
400 NON-CAPITAL OBJECTS

410	Suppl	<mark>ies</mark>				
	411	General Supplies				
	415	Food				
	416	Medical Supplies				
	417	Paper				
	418	Medical Supplies for IEP Medical Services				
420	Appar	rel				
430	Instructional Media					
	431	Audiovisual				
	432	Library Books				
	433	Newspapers				
	434	Periodicals				
	439	Other Instructional Media				
440	Non-Capital Equipment					
	443	Containers				
	444	Furnishings				
	445	Measuring Devices				
	446	Tools & Implements				
	449	Other Non-Capital Equipment				

Purchase Items in WISEgrants directly align with Objects or categories in WUFAR

450	Resale Items						
460	Equipment Components						
470	Textbooks & Workbooks						
	471	Textbooks					
	472	Workbooks					
	473	Sheet Music					
	479	Other Instructional Books					
480	180 Non-Capital Technology						
	481	Technology Supplies					
	482	Non-Capital Technology Hardware					
	483	Non-Capital Software					
400	Othor	Non Canital Itoms					

Purchase Item



Purchase Items in Purchased Services

WISEgrants

WUFAR Object

CESA Contract

386 - Payment to CESA

For contracted services, you must first select the vendor type before choosing the service provided.

LEA Contract

382 - Payment to WI School District

DPI Contract

387 - Payment to State

Employee Travel

342 - Employee Travel

Purchasing from a CESA

Unless the item is a non-capital or capital object, the cost will be associated with the purchase item "CESA Contract"

- Maintenance of Special Education Equipment
- Library Media
- Information Technology Services

Supplies, Software or Instructional
Materials purchased through a
CESA must be coded as
non-capital objects and not as
CESA contracts

Purchase Items in Purchased Services

WISEgrants

WUFAR Object

Private Vendor Contract

310 - Personal Services

Support Services (200000s Functions)

Private Vendor Contract

370 - Payment to Non-Gov Agency

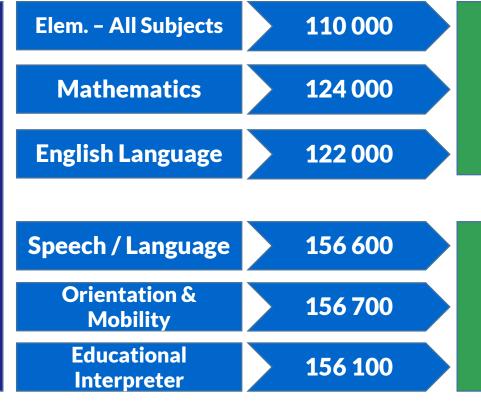
Instruction (431000 or 436000)

IT Private Vendor Contracts

360 - Information Tech Services

Purchasing Instruction

Instruction
purchased from
a CESA (386),
LEA (382),
or
Private Vendor
(370)



431 000 –
General Contracted
Instruction

436 000 –
Special Education
Contracted
Instruction

Different Non-Capital Objects

Items given out, consumed, or disposable	Supplies	410	XXXXXX	
Materials related to Instruction	Instructional Media	430	1XXXXX	
Equipment (Non- Technology	Non-Capital Equipment	440	XXXXXX	
Textbooks/Workbooks	Textbooks/Workbooks	470	1xxxxx	
Technology items consumed or disposable	Technology Supplies	481	XXXXXX	
Technology Equipment	Non-Capital Equipment	482	XXXXXX	
Computer Software	Software	483	XXXXXX	
Periodicals / Prof. Library	Other Non-Capital Items	490	2XXXXX	

Purchase Item Detail

WISEgrants

What It Is

Drives WUFAR...

Purchase Detail

Specific cost tied to a broad category

Function and / or Object

Curriculum Development

Professional Development

Remodeling

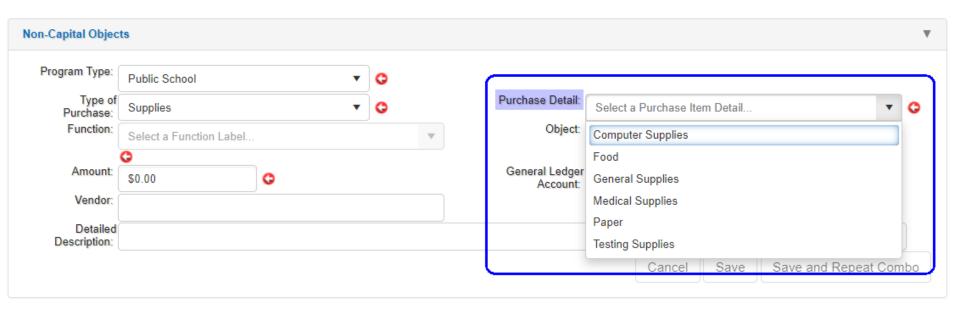
Placement Tuition

Computer Software

Field Trip Fees

Transition Services

Purchase Item Detail



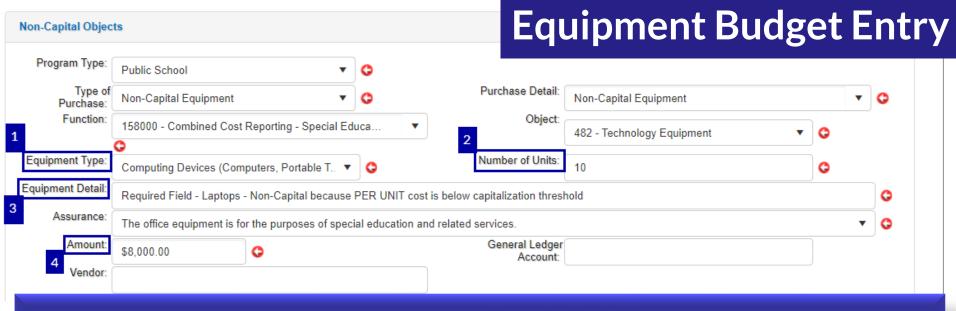
Purchase Detail Driving Function / Object

Purchase Item	Purchase Detail	Function	Object	
Property Services	Remodeling	255300	320	
Communication	Postage	XXXXXX	353	
CESA Contract	Curriculum Devlp.	221200	386	
Supplies	Food	XXXXXX	415	

Equipment

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. (2 CFR §200.33)

Equipment is coded under Non-Capital Objects OR Capital Objects, depending on LEA's capitalization threshold.



Equipment budget items require additional selections, including:

- 1. Equipment Type list of allowable types determined by grant
- 2. # of Units also determines per unit cost
- 3. Equipment Detail additional description field
- 4. Equipment Assurance required dropdown field providing information on how the equipment purchase aligns with the program

Instructional or Non-Instructional

Functions that begin with 1 are "instructional"

- Functions tied to teachers
- ❖ 122 000 English Language; 158 000 Cross Categorical

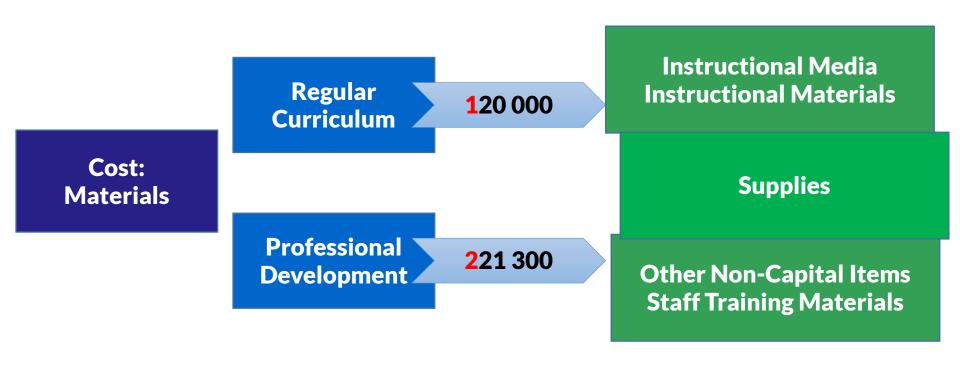
Functions that begin with 2 are "non-instructional"

- Functions tied to pupil- and related services staff
- 212 000 School Social Worker; 215 000 School Psychologist;
 211 000 Dean of Students; 218 000 Physical Therapist

Instructional or Non-Instructional



Instructional and Non-Instructional



Avoid Lumping

Although tempting, shared costs associated with instructional and non-instructional staff should be separated on the subrecipient's ledger and on the subrecipient's grant budget.

Professional development – easy to enter a single amount for function 221 300 (instructional staff training), but the cost should be broken out between teachers and 264 400 for related services staff (school psychologists, social workers, guidance counselors, pupil services directors, school nurses...)

Professional Development Coding

Conference or workshop registration costs are always a purchased service with a function of 221 300 or 264 400.

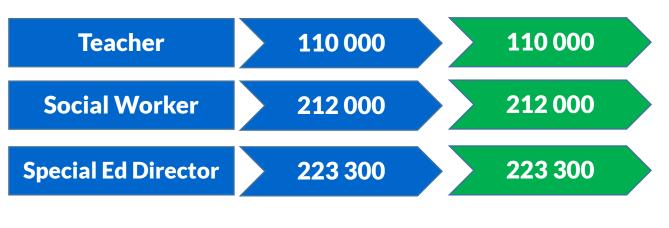
The WUFAR object number is based on who is providing the training – CESA, Private Vendor, DPI, etc.

Object 900 – "Dues and Fees"

Never used for conference or workshop registration costs. Dues and fees cover professional organization fees, DPI staff license fees, or field trip costs.

Professional Development

Salary / Benefit
Functions for Staff
Attending Training
During Regular
Work Schedule

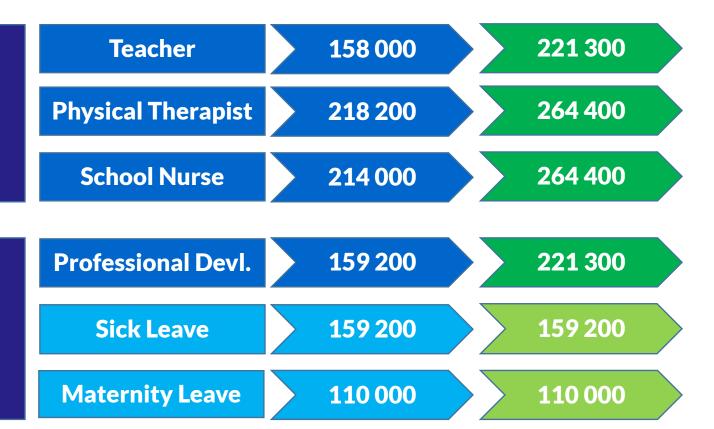


Salary / Benefit
Functions for Staff
Attending Training
Outside of
Regular Schedule

Teacher	110 000	,	221 300
Social Worker	212 000	÷	264 400
Paraprofessional	159 100	,	221 300

Professional Development

Employee Travel – Mileage, Lodging, Meals



Substitute Costs

Budget Revisions

Grant budgets can be revised throughout the grant fiscal year.

Certain factors may require revisions to the budget, such as changes to the allocation, finalizing of carryover, changes made by the LEA to the grant application, or amounts claimed for a line item exceeding the amount budgeted.

Under the Uniform Grant Guidance, LEAs are allowed to claim an overage of line items as long as the accumulated line item overage does not exceed 10% of the approved budget (and is within the approved total budget amount). (2 CFR § 200.308(e))

These overages will cause budget validations that will prevent the submission or future budgets or claims until resolved. These budget validations will display on the budget submission screen and specific budget sections.

Additional Technical Assistance

Allowable Costs Technical Assistance Page

https://dpi.wi.gov/wisegrants/uniform-grant-guidance/allowablecosts

Allowable Costs Checklist

https://dpi.wi.gov/sites/default/files/imce/wisegrants/pdf/Allowable%20costs%20checklist Final.pdf

Claiming Funds

https://dpi.wi.gov/wisegrants/claiming-federal-funds

WUFAR

https://dpi.wi.gov/sfs/finances/wufar/overview

SCENARIOS

A math teacher at a Title I Targeted Assistance school, who is paid out of Title I, Part A, is attending an RtI conference hosted by a private vendor in a different city. All costs related to the conference are being charged to the Title I-A grant.

Provide the accounting string including Fund, Location, Object, Function and Project Codes for the expenses below:

- Teacher's salary and benefits while attending the conference
- Conference registration cost
- Mileage
- Lodging/Meals
- District substitute covering the teacher's classes

Provide the accounting string including Fund, Location, Object, Function and Project Codes for the questions below:

- How would you code a <u>district</u> employed substitute teacher covering classes for a cross categorical teacher charged to the IDEA grant who was on paternity leave?
- How would you code a <u>contracted</u> substitute teacher covering classes for a cross categorical teacher charged to the IDEA grant who was on maternity leave?

 Hint: It does not relate

to the type of leave

used in the example.

The school district is purchasing two software programs, Read 180 for reading interventions and behavioral progress monitoring software for the school psychologist. Both are charged to the IDEA CEIS grant.

Provide the accounting string including Fund, Location, Object, Function and Project Codes for both software types.

How would you code the following, paid for using local funds only:

- Purchasing visual impairment instruction from CESA
- Maintaining FM system maintenance from CESA
- Purchasing speech and language testing supplies from CESA

Provide the accounting string including Fund, Location, Object, Function and Project Codes.

Provide the accounting string including WISEgrants Purchase Item, Fund, Location, Object, Function and Project Codes for each of the Title I-A grant expenses below:

- Reading A to Z licenses for computer-based instructional software (paid for as a service)
- Books handed out at a parent literacy night for families to take home
- Books for teacher book study on RtI
- Math intervention workbooks
- Universal Screener software
- Phonics sound cards for Kindergarten